



# NORLITE, LLC

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February 8, 2013

Karen M. Gaidasz, CPESC  
Environmental Analyst  
New York State Department of Environmental Conservation  
Region 4  
1130 North Westcott Road  
Schenectady, NY 12306-2014

RETURN RECEIPT REQUESTED VIA EMAIL

Mr. Kenneth Eng  
Air Compliance Branch  
United States Environmental Protection Agency  
Region 2  
290 Broadway  
New York, NY 10007-1866

RETURN RECEIPT REQUESTED VIA EMAIL

Re: Norlite Corporation-MACT Excessive Exceedances Report  
Kiln 1: 01/31/13 – 02/07/13

Dear Sirs:

In accordance with 40 CFR 63.1206(c)(3)(vi), the Norlite Corporation (Norlite) is submitting an "Excessive Exceedance Report" for the timeframe of 01/31/13 thru 02/07/13. The attached document explains each of the "malfunctions" for Kilns One.

The results of the investigation concluded a majority of the waste feed cutoffs were a result of the span limit associated with the stack gas flow monitor. The stack gas cutoffs associated with Kiln 1 are due in part to worn out internal parts of the scrubber system. These internals will be repaired or replaced during a planned 10 day shutdown starting on February 03, 2013. Once the internals are repaired or replaced, there should be much less water and soda ash solids contacting the Mist Pad which is contributing the stack gas cutoffs. As stated previously, Norlite and its consultant believe the stack gas cutoffs which are less than 2 minutes in duration to be associated with water droplets hitting the probe.

Norlite is preparing a protocol for the installation of the new scintillation technology flow meters to start the process of side by side data comparison. The hope is to gather data showing the accuracy of the new instruments and then seek approval to remove the current stack probes and to continue using the new monitors. The installation protocol will be completed and stamped by an independent engineer in the near future.

All of the malfunctions that occurred were consistent with our Startup, Shutdown and Malfunction Plan (SSMP). As approved by the NYSDEC on February 6, 2006, these reports are being sent electronically.



## NORLITE, LLC

Should you have any questions regarding this letter, please contact me at (518) 235-0401 or email at: [tvancouver@norlitecorp.com](mailto:tvancouver@norlitecorp.com).

Sincerely,

*Thomas Van Vranken*

Thomas Van Vranken  
Environmental Manager

### Attachments

ecc: Don Spencer, NYDEC – R4 w/attachments  
James Lansing, NYSDEC – CO w/attachments  
Joe Hadersbeck, NYSDEC – R4 w/attachments  
Tita LaGrimas, Tradebe



NORLITE, LLC  
MACT EXCEEDANCE REPORT - KILN 1  
01/31/13 - 02/07/13

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
1/31/2013	21:20:42	1/31/2013	21:23:10	0:02:28	42	Malfunction	The Kiln Was Experiencing Decreased System Draft Due to the Scrubber Being Partially Plugged. Rinsing the Mist Pad Helped Reduce the Level of Plugging. Major Repairs Will Occur On the Baghouse and Scrubber System for this Kiln on 02/03/13.	Front Kiln Pressure, 1 Second Delay	Opl	Kiln Shutdown Starting 2/3/13 to Conduct on Baghouse and Scrubber Systems
2/1/2013	0:07:36	2/1/2013	2:37:53	2:30:17	43	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water From the Scrubber Hitting the Probe. The Scrubber System Was Partially Plugged Which Caused Excess Water in the Scrubber System. Some of the Excess Water Was Able to Pass By the Mist Pad As Water Droplets and Hit the Probe	Stack Gas Flow Rate	Span	Kiln Shutdown Starting 2/3/13 to Conduct on Baghouse and Scrubber Systems
2/1/2013	2:45:08	2/1/2013	2:50:30	0:05:22	44	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water From the Scrubber Hitting the Probe. The Scrubber System Was Partially Plugged Which Caused Excess Water in the Scrubber System. Some of the Excess Water Was Able to Pass By the Mist Pad As Water Droplets and Hit the Probe	Stack Gas Flow Rate	Span	Kiln Shutdown Starting 2/3/13 to Conduct on Baghouse and Scrubber Systems
2/1/2013	2:53:31	2/1/2013	5:00:54	2:07:23	45	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water From the Scrubber Hitting the Probe. The Scrubber System Was Partially Plugged Which Caused Excess Water in the Scrubber System. Some of the Excess Water Was Able to Pass By the Mist Pad As Water Droplets and Hit the Probe	Stack Gas Flow Rate	Span	Kiln Shutdown Starting 2/3/13 to Conduct on Baghouse and Scrubber Systems
2/1/2013	6:39:05	2/1/2013	7:24:57	0:45:52	46	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water From the Scrubber Hitting the Probe. The Scrubber System Was Partially Plugged Which Caused Excess Water in the Scrubber System. Some of the Excess Water Was Able to Pass By the Mist Pad As Water Droplets and Hit the Probe	Stack Gas Flow Rate	Span	Kiln Shutdown Starting 2/3/13 to Conduct on Baghouse and Scrubber Systems
2/1/2013	9:42:35	2/1/2013	9:44:57	0:02:22	47	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water From the Scrubber Hitting the Probe. The Scrubber System Was Partially Plugged Which Caused Excess Water in the Scrubber System. Some of the Excess Water Was Able to Pass By the Mist Pad As Water Droplets and Hit the Probe	Stack Gas Flow Rate	Span	Kiln Shutdown Starting 2/3/13 to Conduct on Baghouse and Scrubber Systems



NORLITE, LLC  
MACT EXCEEDANCE REPORT - KILN 1  
01/31/13 - 02/07/13

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
2/1/2013	9:56:06	2/1/2013	10:14:45	0:18:39	48	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water From the Scrubber Hitting the Probe. The Scrubber System Was Partially Plugged Which Caused Excess Water in the Scrubber System. Some of the Excess Water Was Able to Pass By the Mist Pad As Water Droplets and Hit the Probe	Stack Gas Flow Rate	Span	Kiln Shutdown Starting 2/3/13 to Conduct on Baghouse and Scrubber Systems
2/1/2013	10:18:44	2/1/2013	11:37:13	1:18:29	49	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water From the Scrubber Hitting the Probe. The Scrubber System Was Partially Plugged Which Caused Excess Water in the Scrubber System. Some of the Excess Water Was Able to Pass By the Mist Pad As Water Droplets and Hit the Probe	Stack Gas Flow Rate	Span	Kiln Shutdown Starting 2/3/13 to Conduct on Baghouse and Scrubber Systems
2/1/2013	14:18:52	2/1/2013	14:23:19	0:04:27	50	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water From the Scrubber Hitting the Probe. The Scrubber System Was Partially Plugged Which Caused Excess Water in the Scrubber System. Some of the Excess Water Was Able to Pass By the Mist Pad As Water Droplets and Hit the Probe	Stack Gas Flow Rate	Span	Kiln Shutdown Starting 2/3/13 to Conduct on Baghouse and Scrubber Systems
2/1/2013	14:36:32	2/1/2013	15:45:36	1:09:04	51	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water From the Scrubber Hitting the Probe. The Scrubber System Was Partially Plugged Which Caused Excess Water in the Scrubber System. Some of the Excess Water Was Able to Pass By the Mist Pad As Water Droplets and Hit the Probe	Stack Gas Flow Rate	Span	Kiln Shutdown Starting 2/3/13 to Conduct on Baghouse and Scrubber Systems
2/1/2013	16:31:29	2/1/2013	16:43:42	0:12:13	52	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water From the Scrubber Hitting the Probe. The Scrubber System Was Partially Plugged Which Caused Excess Water in the Scrubber System. Some of the Excess Water Was Able to Pass By the Mist Pad As Water Droplets and Hit the Probe	Stack Gas Flow Rate	Span	Kiln Shutdown Starting 2/3/13 to Conduct on Baghouse and Scrubber Systems



NORLITE, LLC  
MACT EXCEEDANCE REPORT - KILN 1  
01/31/13 - 02/07/13

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
2/1/2013	17:07:11	2/1/2013	17:41:37	0:34:26	53	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water From the Scrubber Hitting the Probe. The Scrubber System Was Partially Plugged Which Caused Excess Water in the Scrubber System. Some of the Excess Water Was Able to Pass By the Mist Pad As Water Droplets and Hit the Probe	Stack Gas Flow Rate	Span	Kiln Shutdown Starting 2/3/13 to Conduct on Baghouse and Scrubber Systems
2/1/2013	17:55:59	2/1/2013	18:35:04	0:39:05	54	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water From the Scrubber Hitting the Probe. The Scrubber System Was Partially Plugged Which Caused Excess Water in the Scrubber System. Some of the Excess Water Was Able to Pass By the Mist Pad As Water Droplets and Hit the Probe	Stack Gas Flow Rate	Span	Kiln Shutdown Starting 2/3/13 to Conduct on Baghouse and Scrubber Systems